

FILED
Clerk
District Court

DEC 13 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorney for: Defendants CNMI, Forelli, Bush, Cotton and Brown

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Case No. 05-0027

Plaintiff,

vs.

**UNOPPOSED MOTION TO EXCEED PAGE
LIMIT LOCAL RULE 7.1(d)**

COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS, NICOLE C. FORELLI,
WILLIAM C. BUSH, D. DOUGLAS COTTON,
L. DAVID SOSEBEE, ANDREW CLAYTON,
UNKNOWN AND UNNAMED PERSONS IN
THE CNMI OFFICE OF THE ATTORNEY
GENERAL, ALEXANDRO C. CASTRO, JOHN
A. MANGLONA, TIMOTHY H. BELLAS,
PAMELA BROWN, ROBERT BISOM, AND
JAY H. SORENSEN,

Defendants.

MOTION

Defendants Commonwealth of the Northern Mariana Islands, Nicole Forelli, William C. Bush,
D. Douglas Cotton, and Pamela Brown (hereafter collectively "Defendants") request that this Court

1 allow Defendants to exceed the twenty-five (25) page limit prescribed by L.R. 7.1(d).

2 Defendants intend to file a motion to dismiss Plaintiff Bradshaw's Amended Complaint under
3 Fed. R. Civ. P. 12 (b) (6). Plaintiff's Amended Complaint is eighty-one (81) pages long and contains
4 numerous causes of action under an exhaustive list of federal civil and criminal statutes, including,
5 among others, the Racketeer Influence Corrupt Organizations Act, the Immigration Reform and
6 Control Act and several Federal Civil Rights causes of action. In the interest of judicial economy,
7 Defendants intend to file one consolidated motion to dismiss.

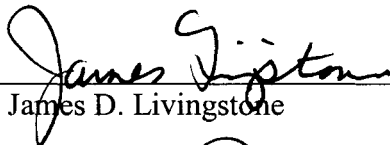
8 Crafting a motion to dismiss, which addresses Plaintiff Bradshaw's numerous allegations is
9 quite an undertaking requiring Defendants to discuss numerous legal theories, causes of action and
10 factual matters. Defendants believe their motion will be fifty (50) pages or less and intend to file it on
11 or before December 23, 2005.

12 Plaintiff Bradshaw was contacted telephonically by Assistant Attorney General Kristin St.
13 Peter and has no objection to this Motion.

14 WHEREFORE, based upon the foregoing, Defendants respectfully request that this Court grant
15 Defendants' Motion to Exceed Page Limit.

16 Respectfully submitted,

17 CNMI ATTORNEY GENERAL'S OFFICE
18 ON BEHALF OF DEFENDANTS CNMI, FORELLI,
19 BUSH, COTTON AND BROWN

20 By 
James D. Livingstone

21 By 
22 Kristin D. St. Peter

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served, via U.S. Mail, on
the 13 day of December, 2005, upon the following:

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